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18	Counsel for Defendant Google LLC	
19	INITED STATES	DISTRICT COURT
20	UNITED STATES	DISTRICT COURT
	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
21	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER	Case 110. 4.20-61-03004-1 GIC-5 1 IX
22	CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
23	individually and on behalf of themselves and	SUPPORT OF PLAINTIFFS'
	all others similarly situated,	ADMINISTRATIVE MOTION TO SEAL
24	Plaintiffs,	PORTIONS OF PLAINTIFFS'
25	Piamuris,	PROPOSED FINDINGS OF FACT AND
25	V.	CONCLUSIONS OF LAW (DKT. 551)
26		,
	GOOGLE LLC,	Judge: Hon. Susan van Keulen, USMJ
27	Defendant.	
20	Defendant.	
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Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

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- 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 551.
- 3. On April 18, 2022, Plaintiffs filed their Administrative Motion to Seal Portions of Plaintiffs' Proposed Findings of Fact and Conclusions of Law. On April 18, 2022, I received an unredacted service copy of these documents.
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document					
Plaintiffs' Proposed Findings of					
Fact and Conclusions of Law (Dkt.					
551)					

Pages 3:23-25, 4:2-4, 4:24-25, 5:19-22, 6:1-2, 6:5, 6:9, 6:11, 6:13, 6:25, 7:22-23, 7:25, 8:2-3, 8:8, 8:11, 8:17-9:15, 15:15-17, 16:14-17, 19:25, 21:2, 21:6, 23:1, 23:3, 25:16-17, 26:7-9, 26:11, 26:17, 27:1-2, 27:7, 27:26, 28:1-3, 28:17, 28:19, 28:27, 29:11, 29:16, 30:3, 30:6-7, 30:19, 31:10, 31:13, 31:15-16, 31:20, 31:27, 33:5, 33:18, 35:5, 35:16, 41:18-19, 41:22, 41:25, 42:1, 42:10, 42:13, 42:17, 42:25, 47:15, 52:22, 53:9-10

The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

Basis for Sealing

1	5. Google's request is narrowly tailored in order to protect its confidential information.	
2	These redactions are limited in scope and volume. Because the proposed redactions are narrowly	
3	tailored and limited to portions containing Google's highly-confidential or confidential information,	
4	Google requests that the portions of the aforementioned documents be redacted from any public	
5	version of those documents.	
6	6. Google does not seek to redact or file under seal any of the remaining portions of	
7	Plaintiffs' Proposed Findings of Fact and Conclusions of Law not indicated in the table above.	
8	I declare under penalty of perjury of the laws of the United States that the foregoing is true	
9	and correct. Executed in San Francisco, California on April 25, 2022.	
10		
11	DATED: April 25, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
12	SULLIVAN, LLF	
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14	By /s/ Jonathan Tse Jonathan Tse	
15	Attorney for Defendant	
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